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14 UNITED STATES DISTRICT COURT
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16 NORTHERN DISTRICT OF CALIFORNIA
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18 SAN FRANCISCO DIVISION
19

20 WAYMO LLC,
21
22 Plaintiffs,
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24 v.
25
26 UBER TECHNOLOGIES, INC.;
27 OTTOMOTTO, LLC; OTTO TRUCKING
28 LLC,
29
30 Defendants.

Case No.: 17-cv-00939-WHA

**ADMINISTRATIVE MOTION TO
SEAL PORTIONS OF MR.
KALANICK'S OPPOSITION TO
WAYMO'S MOTION TO COMPEL
MR. KALANICK'S CELL
PHONE/CELL PHONE IMAGE AND
SUPPORTING MATERIALS**

Non-Party Travis Kalanick hereby moves to file portions of his Opposition to Waymo's Motion to Compel Text Messages (Dkt. 1118) and supporting materials under seal pursuant to Civil Local Rules 7-11 and 79-5.

The Protective Order in this case states that when material has been designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY," a party may not file it in the public record, but must seek to file it under seal pursuant to Civil Local Rule 79-5. Mr. Kalanick's counsel and Waymo's counsel agreed that the contents of an August 4, 2017 discussion between their respective forensics experts would be treated as confidential, and this confidentiality agreement was a condition precedent to the discussion. Accordingly, Mr. Kalanick respectfully requests permission to file the following portions of his Opposition and supporting documents under seal:

Document	Text to be Sealed
Opposition Letter Brief	Page 2, first paragraph: text from after the word "produce" to the word "that" in the first complete sentence Page 2, second paragraph: text from after the word "production" to the word "that" in the third sentence.
Declaration of Allan T. Vogel	Page 4, the entirety of Paragraph 13

Dated: August 10, 2017

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By: /s/ Melinda L. Haag

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